

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In Re: ) Case No. 14-13193  
Trend Sound Promoter AMG Corp., ) UNITED STATES TRUSTEE'S  
Debtor. ) RESPONSE TO AMENDED MOTION  
FOR FINAL FEES FOR VLADIMIR  
RASKIN

Gail Brehm Geiger, the Acting United States Trustee for Region 18, by and through her undersigned attorney, Sarah R. Flynn, responds to the Amended Motion for Final Fees of Vladimir Raskin (the "Amended Fee Application") and states as follows:

1. Trend Sound Promoter AMG Corp. (the "Debtor") filed a voluntary petition for chapter 11 relief on April 25, 2014. The Debtor's chapter 11 case was short lived. On May 29, 2014, the United States Trustee filed a Motion to Convert Chapter 11 Case or for Appointment of Chapter 11 Trustee (the "Motion to Convert"). On May 30, 2014, the Debtor filed a motion to convert to chapter 7. An order converting the case was entered June 2, 2014.

2. On May 23, 2014, the Debtor filed an application to hire Mr. Raskin as accountant (the "Employment Application"). On June 17, 2014, the Court entered an order approving the Employment Application.

3. On September 22, 2014, Mr. Raskin filed an Application for Compensation (the "Initial Fee Application"). ECF No. 209. The Initial Fee Application requested \$11,869 for professional services rendered by Mr. Raskin from April 25, 2014, to May 30, 2014. On

1 November 21, 2014, the United States Trustee objected to the Initial Fee Application because it  
2 did not include information required under Local Rule 2016. ECF No. 216. The chapter 7 trustee  
3 also objected to the Initial Fee Application. ECF No. 217. Ultimately, the Initial Fee Application  
4 was never confirmed for argument or approved.

5 4. On January 5, 2015, Mr. Raskin filed the Amended Fee Application. The  
6 Amended Fee Application includes a detailed time record that is consistent with the  
7 requirements of the Local Rules, and requests \$12,199 for professional services rendered and  
8 costs incurred from April 25, 2014 to May 30, 2014.

9 5. The United States Trustee recommends a reduction of Mr. Raskin's fees in the  
10 total amount of \$1,300:

11 The Amended Fee Application includes \$700 for 3.5 hours spent at a hearing on May 1,  
12 2014, which was also attended by the Debtor's bankruptcy counsel, Larry Feinstein. Mr. Raskin  
13 did not testify at the May 1, 2014 hearing. The United States Trustee objects to this time entry  
14 because it pertains to the administration of the Debtor's bankruptcy and is therefore outside the  
15 scope of Mr. Raskin's employment as accountant, and/or duplicative of services provided by the  
16 Debtor's bankruptcy counsel.

17 The Amended Fee Application includes \$600 for 3 hours spent on preparation of "motion  
18 for final fees" (the First Fee Application). As previously discussed, the United States Trustee  
19 objected to the First Fee Application as inadequate under the Local Rules, and the Application  
20 was never approved.

21 Based on the foregoing, the United States Trustee requests that the Court deny approval  
22 of the Amended Fee Application in any amount in excess of \$10,899.

23 Respectfully Submitted,

24 GAIL BREHM GEIGER  
25 Acting United States Trustee for Region 18

26 /s/ Sarah R. Flynn

Sarah R. Flynn, NCBA #42829

Attorney for the United States Trustee

Office of the United States Trustee  
700 Stewart Street, Suite 5103  
Seattle, WA 98101  
206-553-2000, 206-553-2566 (fax)